

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOSEPH A. DAOU and KAREN M. DAOU,

Plaintiffs,

-against-

BLC BANK, S.A.L.; CREDIT LIBANAIS, S.A.L.;
AL-MAWARID BANK, S.A.L.; and BANQUE
DU LIBAN,

Defendants.

Case No. 1:20-cv-04438 (DLC)

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the First Amended Complaint filed in this action; the accompanying Memorandum of Law in Support of Motion to Dismiss of Defendant AM Bank S.A.L.; the Declaration of Youssef Hanna El Khoury (ECF 41-2) and the Declaration of Malek Arslan (ECF 41-9) previously filed in this action, together with the exhibits thereto; all prior pleadings and filings in this action; all matters of which the Court may take judicial notice; and such other and further matters as may be presented at the hearing on this Motion or prior to the Court's decision thereon, Defendant AM Bank S.A.L. (sued as Al-Mawarid Bank, S.A.L.) will move this Court, before the Honorable Denise L. Cote, at the United States Courthouse, 500 Pearl Street, New York, NY 10007, on a date and time to be designated by the Court, for an Order dismissing the First Amended Complaint as against Defendant AM Bank S.A.L. pursuant to the doctrine of *forum non conveniens* and Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), and for such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order of November 4, 2020, and unless otherwise agreed, papers in opposition to this Motion shall be due on or before December 18, 2020, and papers in reply shall be due on or before January 8, 2021.

Dated: November 20, 2020

Respectfully submitted,

SQUIRE PATTON BOGGS (US) LLP

/s/ Gassan A. Baloul

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